

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
SCRANTON DIVISION

THE INDEPENDENCE PROJECT, INC.,  
a New Jersey Non-Profit Corporation, and  
RONALD MOORE, Individually,

Plaintiffs,

v.

CASE NO.: 3:13-CV-02053-RDM

POCONO INTERNATIONAL RACEWAY,  
INC., a Pennsylvania Corporation,

Defendant.

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**STIPULATION FOR DISMISSAL WITH PREJUDICE, WITH COURT'S RETENTION  
OF JURISDICTION TO ENFORCE SETTLEMENT AGREEMENT**

Plaintiffs and Defendant, pursuant to the Federal Rules of Civil Procedure, hereby move to dismiss this action with prejudice. The parties have agreed that the Court shall retain jurisdiction to enforce the terms and conditions of the settlement.

Respectfully Submitted,

**/s/John P. Fuller**

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Date: **January 28, 2014**

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